

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

RICHARD HUBBARD, III, et al.,	)	CASE NO.: 1:18-CV-02252
	)	
Plaintiff,	)	JUDGE: DAN AARON POLSTER
	)	
vs.	)	<b><u>DEFENDANTS OFFICER MICHAEL</u></b>
	)	<b><u>AMIOTT, OFFICER MATT GILMER,</u></b>
CITY OF EUCLID, et al.,	)	<b><u>AND OFFICER KIRK PAVKOV'S</u></b>
	)	<b><u>INITIAL DISCLOSURES</u></b>
Defendants	)	
	)	

Now come Defendants, Officer Michael Amriott, Officer Matt Gilmer, and Officer Kirk Pavkov, by and through counsel, Mazanec, Raskin & Ryder Co., L.P.A., and hereby submit their Initial Disclosures pursuant to Civil Rule 26 and the Court's Orders.

**I. INDIVIDUALS – RULE 26(A)(1)(A)(I)**

These Defendants identify the following individuals as likely to have discoverable information that may be used to support their claims and defenses:

1. Officer Michael Amriott – Defendant Euclid Police Officer with knowledge of the facts and circumstances surrounding the incident that forms the basis of the Complaint; may be contacted through counsel.
2. Officer Matt Gilmer - Defendant Euclid Police Officer with knowledge of the facts and circumstances surrounding the incident that forms the basis of the Complaint; may be contacted through counsel.
3. Officer Kirk Pavkov - Defendant Euclid Police Officer with knowledge of the facts and circumstances surrounding the incident that forms the basis of the Complaint; may be contacted through counsel.
4. Officer Shane Rivera – Euclid Police Officer with knowledge of the facts and circumstances surrounding the incident that forms the basis of the Complaint; may be contacted through counsel for Euclid.
5. Officer Joseph Parkin – Euclid Police Officer with knowledge of the facts and circumstances surrounding the incident that forms the basis of the Complaint; may be contacted through counsel for Euclid.

6. Officer Daniel Ferritto - Euclid Police Officer with knowledge of the facts and circumstances surrounding the incident that forms the basis of the Complaint; may be contacted through counsel for Euclid.
7. All persons identified in Plaintiffs' Initial Disclosures.
8. Plaintiffs – knowledge of the facts and circumstances surrounding the incident that forms the basis of the Complaint and their damages.
9. Defendants reserve the right to supplement this response if additional persons with knowledge are identified through discovery or otherwise.

**II. DOCUMENTS AND THINGS – RULE 26(A)(1)(A)(II)**

1. Personnel and training files of these Defendants.
2. Policies and procedures of the City of Euclid police department.
3. Dash camera videos depicting the incident at bar.
4. Portions of the transcript of the hearing in the labor arbitration between City of Euclid and Fraternal Order of Police regarding Officer Michael Amriott's grievances.
5. Medical records relating to injuries received by Officer Michael Amriott in the incident at bar.
6. All documents identified by Plaintiffs' Initial Disclosures
7. These Defendants reserve the right to supplement this response if additional documents and things are identified through discovery or otherwise.

**III. DAMAGES – RULE 26(A)(1)(A)(IV)**

Not applicable.

**IV. INSURANCE – RULE 26(A)(1)(A)(IV)**

Not applicable.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

*s/Amily A. Imbrogno*

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Counsel for Defendants Officer Michael Amriott,  
Officer Matt Gilmer, and Officer Kirk Pavkov

**CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, December 06, 2018, a copy of the foregoing Defendants Officer Michael Amriott, Officer Matt Gilmer, and Officer Kirk Pavkov Initial Disclosures were served by electronic mail the following:

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s/Amily A. Imbrogno

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EUCLID-180272/Individual Defendants' ID